

**EXHIBIT 15**

**UNREDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING,  
INC.,

Defendants.

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WAYMO LLC RULE 30(b)(6)  
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ  
PALO ALTO, CALIFORNIA  
THURSDAY, AUGUST 3, 2017

REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2663199

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1 MR. KIM: So let's -- let's move on. 17:13

2 MR. JAFFE: Will you represent you didn't 17:13

3 speak with Mr. Pennecot about his time at Google? 17:13

4 MR. KIM: Well -- 17:13

5 MR. CHATTERJEE: We're taking a deposition 17:13

6 right now. You guys can meet and confer about this 17:13

7 stuff later. 17:13

8 MR. JAFFE: Sounds like a refusal to do that, 17:13

9 so that's noted. We can move on. 17:13

10 MR. CHATTERJEE: Let's focus on the 17:13

11 deposition. You guys have plenty of time for meeting 17:13

12 and conferring. 17:13

13 MR. JAFFE: Sound -- 17:13

14 MR. CHATTERJEE: You're wasting time. 17:13

15 MR. JAFFE: Your refusal is noted. 17:13

16 MR. KIM: So move to strike. 17:13

17 Q Deposition -- Trade Secret No. 96, let's move 17:13

18 to that. 17:13

19 A (Witness complies.) 17:13

20 Okay. 96. 17:14

21 Q So can you explain what, in particular, about 17:14

22 the schematics and layouts contained in the folder 17:14

23 [REDACTED] Waymo considers to be its 17:14

24 trade secret? 17:14

25 A So, I mean, I can't -- you know, I'm not a 17:14

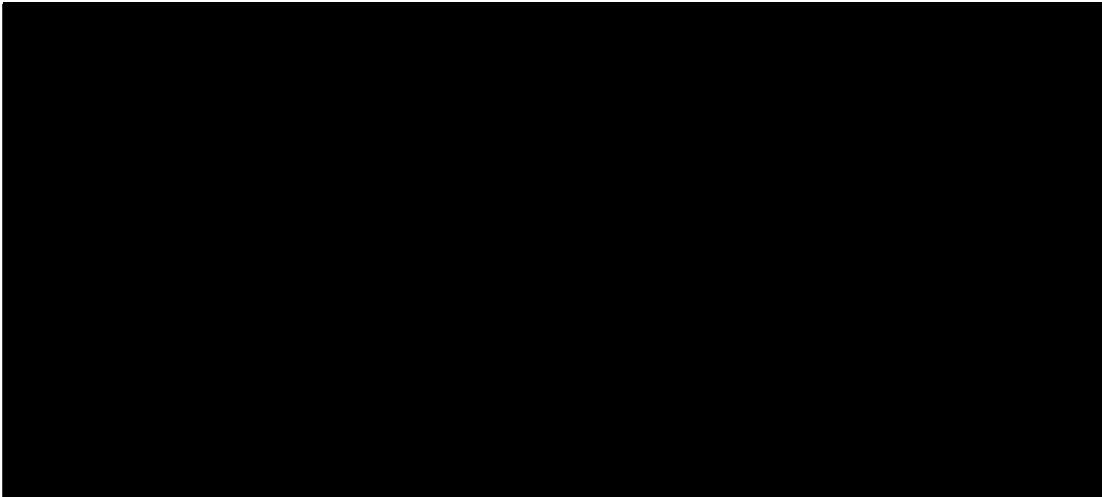
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1 legal expert here, so I'm not going to know exactly 17:14  
2 what is not a trade secret. But I know what we want 17:14  
3 to keep secret -- 17:14  
4 Q Okay. And what -- 17:14  
5 A -- and what we protects. And so the -- 17:14  
6 MR. JAFFE: You're ahead of me. But let me 17:14  
7 just caution you -- 17:14  
8 THE WITNESS: Okay. 17:14  
9 MR. JAFFE: -- not to reveal any 17:14  
10 attorney-client information. 17:15  
11 THE WITNESS: Okay. And so, as a general -- 17:15  
12 you know, like, a -- you know, as a general thing, 17:15  
13 like, all our PCBs and implementations of PCBs and 17:15  
14 circuits are kept secret. You know, we -- we -- we as 17:15  
15 a general policy, like, keep all the -- the -- all 17:15  
16 the -- the design implementations -- okay, sorry -- 17:15  
17 secret. And that -- you know, this board would be 17:15  
18 part of that. 17:15  
19 I'm sorry. Excuse me. 17:15  
20 THE VIDEOGRAPHER: 1286. 17:15  
21 (Document marked Exhibit 1286 17:15  
22 for identification.) 17:15  
23 MR. KIM: So I've marked as Exhibit 1296 -- 17:15  
24 THE VIDEOGRAPHER: '86. 1286. 17:15  
25 MR. KIM: -- oh, 1286, WAYMOUBER00021945 to 17:15

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Q So -- 17:17

A And -- go ahead. 17:17

Q -- are there portions of this design that 17:17  
Waymo would not want to try to keep secret? 17:17

MR. JAFFE: Object to form. 17:17

THE WITNESS: You said would not want to keep 17:17  
secret? 17:17

MR. KIM: Uh-huh. 17:17

THE WITNESS: I mean, overall, I mean, as I 17:17  
said earlier, like, if we don't have, you know, reason 17:18  
to -- to -- to keep our -- you know, to not keep our 17:18  
ideas secrets -- we do keep it secret. So overall, 17:18  
general policy would be to keep it -- all that secret. 17:18

And then for specific, you know, like, 17:18  
business needs or needs, we close -- disclose specific 17:18  
aspect of it. But otherwise, we will keep it secret. 17:18

MR. KIM: Q. So it's your position that 17:18

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1 everything disclosed on this schematic is designed to 17:18  
2 be kept secret? 17:18  
3 MR. JAFFE: Object to form. 17:18  
4 THE WITNESS: That's not exactly what I said. 17:18  
5 As -- as a general policy, we keep it secret. 17:18  
6 The -- if there are specific -- specific instances 17:18  
7 where, you know, we would need to disclose something, 17:18  
8 or it makes sense to disclose something, then some -- 17:18  
9 some may have been disclosed, but I do not know. 17:18  
10 MR. KIM: Okay. 17:18  
11 Q But how would you know what portions are okay 17:18  
12 to disclose outside of Waymo, and what portions are -- 17:18  
13 are not okay to disclose? 17:18  
14 MR. JAFFE: Object to form. 17:18  
15 THE WITNESS: Okay. That would be on a, you 17:18  
16 know, case-by-case basis. You know, like, if we -- if 17:18  
17 we -- I don't know. It would be, like, for a 17:19  
18 specific, you know, like, task or for a specific -- 17:19  
19 like, we would look at, like, what do we need to 17:19  
20 disclose? I don't know. 17:19  
21 For example, for -- I actually don't know 17:19  
22 what we would need to disclose here, but the -- yeah. 17:19  
23 I think -- I mean, the -- I -- I don't -- I don't know 17:19  
24 what we would need to disclose here. It -- it would 17:19  
25 depend on what -- you know, what the need to disclose 17:19

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1 would be. Like, why -- why would we disclose? 17:19

2 MR. KIM: Q. And who would make that 17:19

3 decision? 17:19

4 A I think that would be a condition of, you 17:19

5 know, the design engineer and the manager of the laser 17:19

6 group. 17:19

7 Q And -- 17:19

8 A And probably, like, the -- you know, the -- I 17:19

9 mean, you know, it's -- as I said, it all depends on 17:19

10 why we would be disclosing this thing. What would be 17:19

11 the need? 17:19

12 Q Okay. But the manager of the laser group and 17:19

13 the design engineer would exercise their discretion in 17:20

14 deciding whether or not to -- it's okay to disclose 17:20

15 something for a particular purpose? 17:20

16 MR. JAFFE: Object to form. 17:20

17 THE WITNESS: So depending on the -- the -- 17:20

18 the reason, you know, why -- you know, what -- what 17:20

19 would be the business need, basically? It would be 17:20

20 all different people. 17:20

21 MR. KIM: Okay. 17:20

22 Q I'm just trying to understand what aspects or 17:20

23 what portion of this schematic reflects Waymo trade 17:20

24 secret information? 17:20

25 A So again, like, trade -- you know, trade 17:20

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1 secrets as a whole, I don't know. I don't want to say 17:20  
2 what is and what is not a trade secret. 17:20

3 But, you know, we keep a lot of -- you know, 17:20  
4 there's a lot of design for this thing. We spend a 17:20  
5 lot of time working on this. And, you know, we -- 17:20  
6 everything we can, we keep secret about this because, 17:20  
7 you know, we -- we just don't want to enable other 17:20  
8 people to use what we developed. 17:20

9 Q So sitting here today, you can't tell me what 17:20  
10 portions of what's reflected in Exhibit 1286 are 17:20  
11 Waymo's trade secret and what's not? 17:21

12 MR. JAFFE: Object to form; mischaracterizes 17:21  
13 testimony. 17:21

14 THE WITNESS: Okay. So using trade secrets 17:21  
15 in general -- in general and, you know, the -- the -- 17:21  
16 as I say, like, we -- you know, we have a lot of -- I 17:21  
17 mean, again, I'm not a legal -- I'm not making a legal 17:21  
18 statement here. But we have a lot of trade secrets 17:21  
19 beyond, like, the -- the -- what's listed here in the 17:21  
20 overall, like -- and so the -- the -- there's a lot of 17:21  
21 things that we want to keep secret in this thing and 17:21  
22 not disclose. 17:21

23 The -- if you can make your question more 17:21  
24 specific. 17:21

25 MR. KIM: Well, maybe we can approach it a 17:21



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Is that one of the trade secrets that's 17:28  
embodied in this? 17:28

A I mean -- 17:28

MR. JAFFE: Wait one second. 17:28

THE WITNESS: Go ahead. Sorry. 17:28

MR. JAFFE: So that was a huge speech. I'm 17:28  
going to object to form. 17:28

And I'm also going to object and ask you not 17:28  
to reveal any attorney-client communications. 17:28

Go ahead. 17:28

THE WITNESS: So my understanding is that 96, 17:28  
the trade secret, is the -- the design of the board 17:28  
itself. It's not the -- the -- you know, the -- 17:29  
the -- this design, this board itself, has a lot of 17:29  
things that are important for us. It's not -- I don't 17:29  
think -- I mean, I'm trying to understand, like, why 17:29  
you're trying to relate it to other trade secrets. 17:29  
Sorry. 17:29

MR. KIM: Q. I -- I want to know: What 17:29  
about the board is considered to be a -- a trade 17:29  
secret at Waymo? 17:29

A So -- 17:29

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1 Q What aspects? 17:29

2 MR. JAFFE: Again, I'm going to object to 17:29

3 form. 17:29

4 I'm going to caution you not to reveal any 17:29

5 attorney-client communications. 17:29

6 THE WITNESS: So answering your question -- 17:29

7 your question about what we consider to be -- I mean, 17:29

8 I remove the word "trade" here. 17:29

9 MR. KIM: Okay. 17:29

10 THE WITNESS: I want to -- like, a secret. 17:29

11 MR. KIM: Sure. 17:29

12 THE WITNESS: It's kind of everything. We 17:29

13 want to keep this thing secret. It has a lot of our 17:29

14 work in it. It's a lot of, you know, like, the -- 17:29

15 the -- a lot of the things we -- you know, trial and 17:29

16 errors and -- and things we had to design to get this 17:30

17 to work, are explained in those files. And so 17:30

18 that's -- that's something we want to be known inside 17:30

19 of Waymo. 17:30

20 MR. KIM: Q. Is the -- does this disclose 17:30

21 [REDACTED] 17:30

22 A So this actually -- and "this," you're 17:30

23 talking about the printouts? 17:30

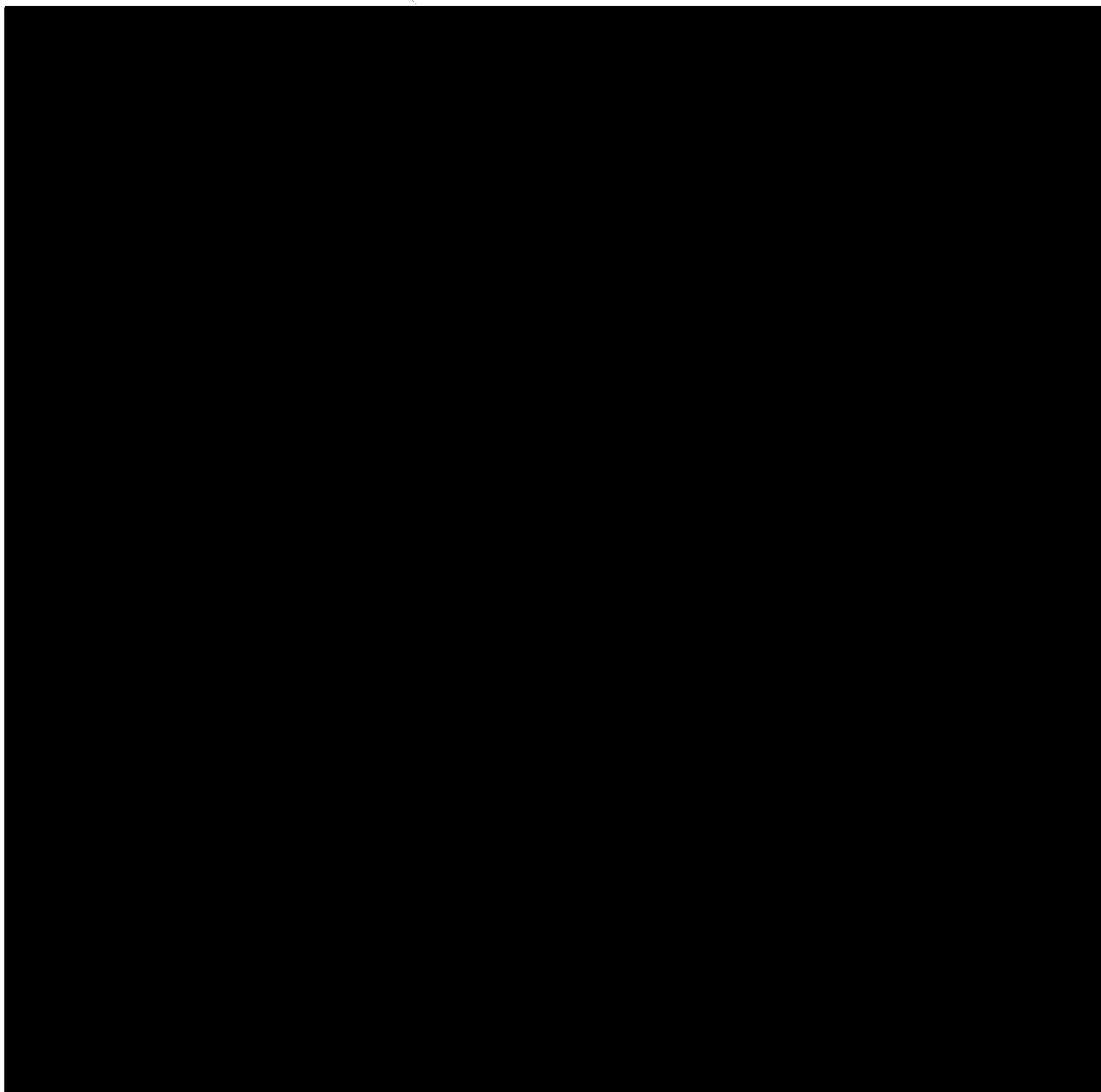
24 Q Yes, Exhibit 1286. 17:30

25 A So the printout -- you could actually [REDACTED] 17:30

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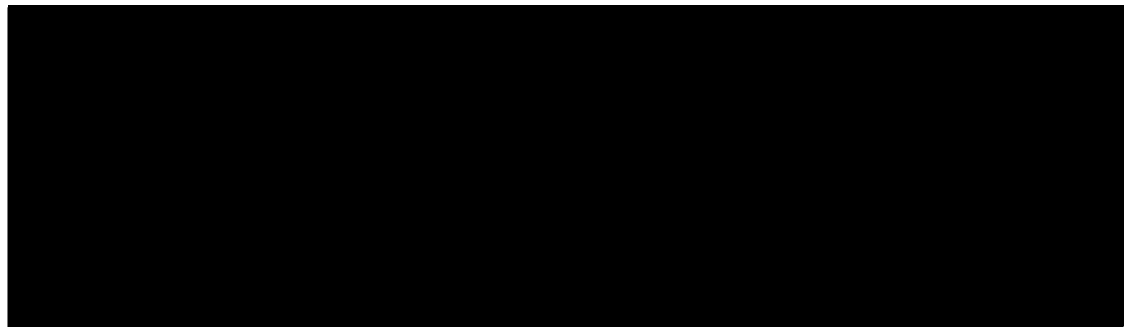
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MR. JAFFE: Object to form, and outside the 17:30  
scope. 17:31

THE WITNESS: So, you know, [REDACTED] 17:31



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[REDACTED]

MR. KIM: Okay. 17:31

Q And so that's one secret that's disclosed by 17:31  
the files of which Exhibit 1286 is a printout; 17:31  
correct? 17:31

MR. JAFFE: Object to form. 17:31

THE WITNESS: The -- I mean, that's one thing 17:31  
you want to keep secret. So, like, the -- that's -- 17:31  
yeah. Go ahead. 17:31

MR. KIM: Okay. 17:31

Q And what's something else that's disclosed in 17:31  
the files that you would want to keep secret? 17:31

MR. JAFFE: Object to form. 17:31

THE WITNESS: Okay. So I can -- another 17:31  
example of something I want to keep secret, the -- you 17:31  
know, the specific -- like, for example, I think one 17:32  
example, [REDACTED] 17:32

[REDACTED] 17:32

MR. KIM: Q. Where is that? 17:32

A That would be, like, the -- you know, those 17:32

[REDACTED]  
[REDACTED] is one example 17:32

1 of something we want to keep secret. 17:32

2 Q Okay. 17:32

3 A It took us a while to figure out which one is 17:32

4 the right one, and so -- 17:32

5 Q What else? 17:32

6 A So another example, you know, there is -- you 17:32

7 know, [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] 17:33

19 And so that -- that's something to keep 17:33

20 secret. Those are examples. There are others. 17:33

21 MR. KIM: Q. What else? 17:33

22 A The -- I think, you know, another example is 17:33

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

17:34

1	Q	What else?	17:34
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2 | A I'm sorry. 17:34

3 Another example would be [REDACTED] [REDACTED]

	[REDACTED]	
--	------------	--

	[REDACTED]	
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	[REDACTED]		
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	[REDACTED]	
--	------------	--

[REDACTED]; right? 17:36

24 MR. JAFFE: Object to form. 17:36

25 THE WITNESS: So same thing. I don't want 17:36

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1 Secret No. 1 is a trade secret -- alleged trade secret 18:42  
2 that may be disclosed in the documents that are 18:42  
3 identified in Trade Secret 96? 18:42  
4 MR. JAFFE: Is this a question for me? 18:42  
5 MR. KIM: Yes. 18:43  
6 MR. JAFFE: He's designated to testify about 18:43  
7 Trade Secret 96. 18:43  
8 MR. KIM: And, to the extent that Trade 18:43  
9 Secret 96 refers to a bunch of files that arguably 18:43  
10 disclose some things that Waymo considers to be trade 18:43  
11 secret, and to the extent it discloses the concept of 18:43  
12 Trade Secret 1, is he designated to be your corporate 18:43  
13 witness on that topic? 18:43  
14 MR. JAFFE: I don't understand that question. 18:43  
15 I encourage you not to waste your time deposing me, 18:43  
16 and instead depose the witness on what he's here to 18:43  
17 testify about. 18:43  
18 MR. KIM: I'm just trying to make this more 18:43  
19 efficient. He's -- do you understand my question, 18:43  
20 Jordan? 18:43  
21 MR. JAFFE: I -- I don't, to be honest. 18:43  
22 MR. KIM: Trade Secret 96 says it's 18:43  
23 claimed -- 18:43  
24 [REDACTED] 18:43  
25 [REDACTED] 18:43



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1 [REDACTED] 18:43

2 We don't know what trade secrets are 18:44

3 encompassed in the design schematics found in that 18:44

4 folder. 18:44

5 And, to the extent that Trade Secret 1, which 18:44

6 is a trade secret that Waymo has alleged from the 18:44

7 beginning of this case is a trade secret concept 18:44

8 that's disclosed in that schematic, I just want to 18:44

9 know if he's prepared to testify about Trade Secret 1 18:44

10 as a corporate witness. 18:44

11 MR. JAFFE: The reason I'm having trouble 18:44

12 understanding what you're asking is, he provided 18:44

13 testimony on these exact questions. He described the 18:44

14 [REDACTED] 18:44

15 [REDACTED] 18:44

16 [REDACTED] 18:44

17 I mean, so what -- what you're trying to do 18:44

18 is kind of a legal construct. And that's why I -- I 18:44

19 don't know. It sounds like you're trying to trick me 18:44

20 into something. 18:44

21 MR. KIM: No. 18:44

22 MR. JAFFE: Which I -- I -- that's why I'm 18:44

23 confused. So I -- he's here to talk about what's in 18:44

24 Trade Secret 96, and ask him whatever you want about 18:44

25 it. 18:44

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1 MR. KIM: And I'm trying not to -- I'm not 18:44  
2 trying to trick you, Jordan. We're not trying to 18:44  
3 trick Mr. Droz. 18:45  
4 He just said he's not prepared to talk about 18:45  
5 Trade Secret 1 as a corporate witness just now. 18:45  
6 And you've been objecting to scope all 18:45  
7 throughout his deposition, to the extent that I've 18:45  
8 been trying to figure out what other trade secrets are 18:45  
9 embodied in what's designated as Trade Secret 96. 18:45  
10 MR. JAFFE: So I -- I'm still having trouble 18:45  
11 tracking. 18:45  
12 What I can tell you is, he's here for Trade 18:45  
13 Secret 96. It includes [REDACTED]  
14 [REDACTED] You can ask him about that 18:45  
15 information. 18:45  
16 If you're asking me, an attorney, to testify 18:45  
17 and compare that to 1 -- 18:45  
18 MR. KIM: I'm not asking you to testify. 18:45  
19 I'm just asking -- asking you: Is he 18:45  
20 designated on Trade Secret No. 1 as a corporate 18:45  
21 witness? 18:45  
22 MR. JAFFE: I -- I mean, is he designated on 18:45  
23 Trade Secret No. 1? He's not. He's designated on 18:45  
24 Trade Secret 96. 18:45  
25 MR. KIM: Okay. 18:45

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1 MR. JAFFE: He's not designated on Trade 18:45  
2 Secret 1 because it's not in our election; right? 18:46  
3 MR. KIM: Okay. 18:46  
4 MR. JAFFE: So -- 18:46  
5 MR. KIM: Fair enough. 18:46  
6 MR. JAFFE: But what I sense you're trying to 18:46  
7 do, and where I sense this is going, is some sort of 18:46  
8 argument that we can't talk about [REDACTED] [REDACTED]  
9 [REDACTED] because we're not talking 18:46  
10 about Trade Secret 1. 18:46  
11 And I'm -- that's -- and so everyone is 18:46  
12 clear, that's exactly not what I'm saying. 18:46  
13 MR. KIM: Q. Mr. Droz, are -- is it your 18:46  
14 understanding that you're here today to testify about 18:46  
15 what's described in Trade Secret 1 of the 1274 18:46  
16 document as a corporate witness? 18:46  
17 A It's -- 18:46  
18 MR. JAFFE: Object to the form. 18:46  
19 THE WITNESS: -- it is my understanding that, 18:46  
20 you know, the -- the -- I am not designated to talk 18:46  
21 about Trade Secret No. 1. That's been dropped. 18:46  
22 MR. KIM: Okay. 18:46  
23 THE WITNESS: It's been dropped, elected. 18:46  
24 MR. KIM: Q. So earlier we were talking 18:47  
25 about -- well, let's -- let's switch topics. 18:47

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CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [ ] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: August 4, 2017



ANDREA M. IGNACIO,

RPR, CRR, CCRR, CLR, CSR No. 9830